

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

In Re:
**KEVIN MILLER, and
TINA MILLER**

Chapter 13
Case No. 18-24466-gmh

Debtors.

Objection to Motion to Continue Stay Due:
May 15th, 2018
Hearing on Timely Filed Objections:
May 22nd @ 1:00pm

NOTICE OF MOTION TO CONTINUE AUTOMATIC STAY

To all creditors and parties in interest:

The Debtors in the above-captioned case has filed a motion to continue the automatic stay pursuant to 11 U.S.C. § 362(c)(3)(B). A copy of that motion accompanies this notice.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the motion to continue the automatic stay, or if you want the Court to consider the views on the motion, then **on or before the Objection Due Date** stated above, you or your attorney must file an objection with:

Clerk, United States Bankruptcy Court
517 East Wisconsin Avenue
Milwaukee, WI 53202-4581

and provide copies to:

Bankruptcy Law Offices
of Richard A. Check
757 N Broadway, Suite 401
Milwaukee, WI 53202

Rebecca R. Garcia
Chapter 13 Trustee
PO Box 3170
Oshkosh, WI 54903

in time for its **receipt** by the above deadline. If you do not file a timely objection, the Court may decide you do not oppose the relief sought in the motion and may enter an order granting that relief.

Prepared by:
Attorney Richard A. Check, Esq.
757 N Broadway, Suite 401
Milwaukee, WI 53202
P. 414.223.0000
F. 414.223.3245
E. court@richardacheck.com

The Court will hold a hearing on any timely-filed objection. The hearing will take place before Judge Susan V. Kelley, United States Bankruptcy Judge, in the United States Courthouse at 517 East Wisconsin Ave, Milwaukee, WI, in Room 167 at the hearing time and date stated above. The debtors and the objecting party and/or their counsel must attend the hearing.

The Court will also hold a hearing if the Debtor fails to file a supporting affidavit or declaration that complies with 11 U.S.C. § 362(c)(3)(B). The hearing will take place at the same time and place stated above, and the Debtors and Debtors' counsel must attend this hearing, or the Court will not grant the motion. If the Debtor files such an affidavit, but the Court determines that it is insufficient to comply with § 362(c)(3)(B), the Court will notify counsel for the Debtors.

Date: 5/4/2018

/s/
Attorney for Debtor
Richard A. Check, S.C.
#10122-04

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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

In Re:

**KEVIN MILLER, and
TINA MILLER**

Chapter 13
Case No. 18-24466-gmh

Debtor(s).

MOTION TO CONTINUE AUTOMATIC STAY TO ALL CREDITORS

COMES NOW, Kevin and Tina Miller, Debtors herein, by counsel, Attorney Richard A. Check, and hereby move the Court to continue the automatic stay pursuant to Section 362(c)(3)(B) of the Bankruptcy Code. In support of this Motion, Debtors state the following:

1. Debtors filed their Chapter 13 Bankruptcy Petition on May 4, 2018.
2. Debtors had a previous Chapter 13 pending within the last year under Case Number: 17-30290-gmh.
3. The previous Chapter 13 Case was dismissed for failure to provide information.
4. The Debtors cooperated with their previous Attorney to file the necessary documents, but for some reason their former Attorney failed to file within the time period allotted by the court.
5. Debtors assert that their circumstances have changed and that this bankruptcy is filed in good faith.
6. Now, Debtors have hired Attorney Richard Check who will have all the necessary documentation filed and will cooperate with all the court orders set forth.
7. Debtors seek to have the automatic stay continued to all scheduled creditors.
8. WHEREFORE, the Debtors respectfully request that the Court enter an Order continuing the automatic stay to all creditors and that such stay shall remain in effect

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until discharge, dismissal, or the entry of an order granting relief from the Automatic stay, and for all other appropriate relief.

Dated this 4th day of May, 2018

Respectfully Submitted,

S://

Richard A. Check
Attorney for Debtor
Bar #10122-04

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Attorney Richard A. Check, Esq.
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CERTIFICATE OF SERVICE

I hereby certify that a copy of this Notice and Motion to Continue Stay were mailed First Class to persons mentioned below, at their respective addresses, postage prepaid, by U.S. Mail in Milwaukee, WI on May 4, 2018

Kevin and Tina Miller,
6329 W Goodrich Ln.
Milwaukee, WI 53223

*See Attached Creditor Matrix

Additionally, the documents referenced above were also served via electronic means on the following individuals on May 4, 2018

United States Trustee Eastern District of WI 517 E Wisconsin Ave, Rm 430 Milwaukee, WI 53202	Rebecca Garcia Chapter 13 Trustee P.O. Box 3170 Oshkosh, WI 54903-3170
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Date: 5/4/2018

S://
Elaina Goy
Paralegal for Attorney Richard A. Check

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Attorney Richard A. Check, Esq.
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